
**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Metalworking Lubricants Co
1509 South Senate Avenue
Indianapolis, Indiana 46225

ATTENTION:

Bernie Ingle, Plant Manager

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Metalworking Lubricants Co (MLC or you) to conduct testing and submit certain information at your facility located at 1509 South Senate Avenue, Indianapolis, Indiana. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us according to the schedule in Appendix B. Appendix C specifies the minimum content of your test protocol.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

MLC owns and operates an emission source at the Indianapolis, Indiana facility. We are requesting this information to determine whether your emission source is complying with the Indiana State Implementation Plan and the Clean Air Act.

MLC must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

MLC must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix D, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix D provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

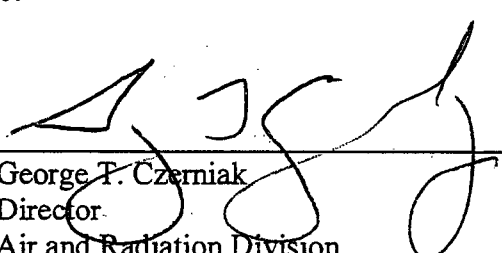
We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject MLC to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Shilpa Patel at (312) 886-0120, or Linda H. Rosen, at (312) 886-6810.

Date

7/22/15


George T. Czerniak
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should

allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix D for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or Indiana State implementation plan.

- (1) The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
- (2) The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

Appendix B

Information You Are Required to Submit to EPA

Metalworking Lubricants Co (MLC) must conduct testing and submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) in accordance with the schedule specified in paragraph 1 below:

1. MLC must submit the following information and conduct emission testing on its scrubber/carbon box system and sampling at certain tanks in accordance with the following schedule:

Submit Testing Protocol for Method TO-15 Testing	No later than 30 days after receipt of this request
Conduct TO-15 Testing and Submit Results	No later than 60 days after receipt of this request
Submit Testing and Sampling Protocol for all other Testing and Sampling	No later than 75 days after receipt of this request
Submit Notification of Intent to Test and Sample	No less than 21 days before testing
Conduct Emission Testing Required by Paragraph 3	No later than 120 days after receipt of this request
Conduct Tanks Sampling Required by Paragraph 4	No later than 120 days after receipt of this request
Submit Final Testing and Sampling Report(s) for testing required by Paragraph 3	No later than 30 days after completion of the emission testing and sampling
Submit information requested by Paragraph 9	No later than 30 days after receipt of this request
Submit information requested by Paragraph 10	No later than 60 days after receipt of this request

2. MLC must conduct Method TO-15¹ testing to determine all individual organic hazardous air pollutants that are present in the inlet gas stream to the scrubber/carbon box system, and their approximate concentrations, and submit the results of this testing, within 60 days of receipt of this request. MLC must submit a protocol to EPA for the TO-15 testing within 30 days of receipt of this request. The protocol must contain the information required by Appendix C of this request, as applicable. EPA will approve, or modify and approve, the protocol within 15 days after receipt of a complete submittal. MLC must comply with all modifications or changes EPA makes to the protocol. The TO-15 testing must be conducted in accordance with a protocol approved, or modified and approved, in advance by EPA. Additionally, the emissions testing must meet the requirements identified below:

¹ Compendium Method TO-15, found in Compendium of Methods for the Determination of Toxic Organic Compounds in Ambient Air-Second Edition, EPA/625/R-96/010b January 1999, and the Supplement to EPA Compendium Method TO-15, 2/18/2009.

- a. The TO-15 test must consist of at least three, one-hour runs at the inlet to the scrubber/carbon box system.
 - b. The TO-15 test must be conducted while all process equipment, tanks and scrubber/carbon box system are operating under conditions representative of normal operations and normal production levels.
 - c. The TO-15 test must be conducted while all emissions from all tanks that are normally controlled are being routed to the scrubber/carbon box system.
 - d. MLC must monitor and record the following parameters at least once every 15 minutes during the entirety of the emission test: pressure drop across the scrubber, free chlorine concentration in the scrubber system, pH of the scrubbing liquor, gas temperature, pump pressure, makeup water flow rate, amount of sodium hypochlorite (bleach) added, temperature of each heated tank routed to the scrubber, and pressure of each tank routed to the scrubber.
 - e. At least twice during each test run, MLC must verify that the scrubber pump and fan are operating.
3. MLC must conduct volatile organic compound (VOC); individual organic hazardous air pollutants (HAP), carbonyl sulfide, carbon disulfide, hydrogen sulfide, methyl mercaptan, and sulfur dioxide (SO₂) emission testing according to the EPA Methods listed below at its scrubber/carbon box control system no later than 120 days after receipt of this request. The emissions testing must be conducted under conditions that represent normal operations and result in adequate data to establish an appropriate range for each operating parameter, including but not limited to, differential pressure, free chlorine concentration, pH, gas temperature, pump pressure, makeup water flow rate, amount of sodium hypochlorite (bleach) added, tank temperatures and tank pressures. The test must comport with the testing protocol approved, or modified and approved, by EPA, as required by Paragraph 6 of this Request. Additionally, the emissions testing must meet the requirements identified below:
- a. Gaseous emission testing must be conducted at the inlet and outlet of the scrubber/carbon box system combination. Emission testing must be conducted using EPA Reference Methods as follows:
 - i. Method 25A must be used to determine VOC concentrations (as propane);
 - ii. Methods 18, 308, 323 and/or 320, as applicable, must be used to determine VOC and individual organic HAP emissions (Method TO-15 must be used beforehand to confirm the identity of HAPs to be tested);
 - iii. Method 15 must be used to determine carbonyl sulfide, carbon disulfide, and hydrogen sulfide concentrations;
 - iv. Method 16 must be used to determine methyl mercaptan concentration;
 - v. Method 6 must be used to determine SO₂ concentration;

- vi. Method 1 or 1A must be used for sample and velocity traverses;
 - vii. Method 2, 2A, 2C or 2D must be used for velocity and volumetric flow rates;
 - viii. Method 3 or 3A must be used for gas analysis;
 - ix. Method 4 must be used for stack gas moisture; and
 - x. Methods 2, 2A, 2C, 2D, 3, and 4 must be performed, as applicable, at least twice during each run.
- b. The Method 18 testing must determine the concentrations of the organic HAPs determined to be present in the inlet and outlet gas streams by the T0-15 testing required by Paragraph 2 of this request.
 - c. Each emission test must consist of at least three, one-hour runs.
 - d. Each emission test must be conducted while all process equipment, tanks and scrubber/carbon box system are operating under conditions representative of normal operations and normal production levels.
 - e. Each emission test must be conducted while all emissions from all tanks that are normally controlled are being routed to the scrubber/carbon box system.
 - f. Each emission test must determine the mass emission rate of VOC, SO₂, individual organic HAPs, carbonyl sulfide, carbon disulfide, hydrogen sulfide, and methyl mercaptan in the inlet and outlet stream of the scrubber/carbon box system in pounds per hour (lb/hr).
 - g. Each emission test must determine the VOC, SO₂, individual organic HAPs, carbonyl sulfide, carbon disulfide, hydrogen sulfide, and methyl mercaptan removal efficiencies (in percent) for the scrubber/carbon box system based on the inlet and outlet VOC, SO₂, organic HAPs, carbonyl sulfide, carbon disulfide, hydrogen sulfide, and methyl mercaptan mass concentrations measured during the emissions testing.
 - h. MLC must monitor and record the following parameters at least once every 15 minutes during the entirety of each emission test: pressure drop across the scrubber, free chlorine concentration in the scrubber system, pH of the scrubbing liquor, gas temperature, pump pressure, makeup water flow rate, amount of sodium hypochlorite (bleach) added, temperature of each heated tank routed to the scrubber, and pressure of each tank routed to the scrubber.
 - i. At least twice during each test run, MLC must verify that the scrubber pump and fan are operating.
4. Within 120 days of the receipt of this request, MLC must perform the following sampling and testing at all uncontrolled storage tanks (ex. ST 10, ST11, etc.), obtain samples according to ASTM D4057 and D5842, and determine the vapor pressure of the stored material following ASTM D2879. The sampling must comport with the sampling protocol approved by EPA, as required by Paragraph 6 of this Request:

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- a. The sampling event at each tank identified above shall occur directly after a heating cycle event (if the tank is heated) has completed and not during loading or unloading of the tank;
 - b. At least three individual samples shall be taken from each tank from the top, middle, lower levels of the tank;
 - c. Each emission test must be conducted while all process equipment, tanks and scrubber/carbon box system are operating under conditions representative of normal operations and normal production levels;
 5. For the testing and sampling required by Paragraphs 2, 3 and 4, MLC must not perform any maintenance other than routine maintenance on its process equipment, tanks, or control systems from the time period starting on the date of receipt of this request until the date of the testing and sampling. For example, MLC must not change out the carbon in the carbon box or perform other non-routine maintenance prior to testing unless MLC can verify that such maintenance was performed pursuant to a regular maintenance schedule that has been consistently followed for the past 60 months.
 6. For the testing and sampling required by Paragraphs 3 and 4, MLC must submit to EPA and the Indiana Department of Environmental Management (IDEM) a proposed testing and sampling protocol no later than 75 days after receipt of this request. The testing and sampling protocol must completely describe the methods and procedures to be used for the emissions testing and sampling required by this request. The testing and sampling protocol must also address the requirements of Paragraphs 3-5. The minimum content of the testing and sampling protocol is contained in Appendix C to this request. EPA will approve, or modify and approve, the protocol within 15 days after receipt of a complete submittal. MLC must comply with all modifications or changes EPA makes to the protocol. The testing and sampling required by Paragraphs 3 and 4 must be conducted in accordance with a protocol approved, or modified and approved, in advance by EPA.
 7. For the testing and sampling required by Paragraphs 3 and 4, MLC must submit to EPA and IDEM a notification of intent to test and sample no less than 21 days before performing the emission testing and sampling. The intent to test and sample must identify the dates, times, methods to be used, and other relevant information related to the emissions testing and sampling protocol required by this request.
 8. MLC must submit a final report for the testing and sampling required by Paragraphs 3 and 4 no later than 30 days after completion of the emission testing and sample. The final report must include, at a minimum, the information identified below.
 - a. Summary of Results
 - i. Results of the above specified scrubber/carbon box emissions tests
 - ii. Results of each sampling event performed at each tank;
 - iii. Process, tank and control equipment data related to operation and determining compliance;
 - iv. Discussion of test errors;

- v. Discussion of any deviations from the reference test methods and procedures;
 - vi. Production data; and
 - vii. Calculation of an appropriate range for each parameter, including but not limited to pressure drop across the scrubber, free chlorine concentration in the scrubber system, pH of the scrubbing liquor, gas temperature, pump pressure, makeup water flow rate, amount of sodium hypochlorite (bleach) added, temperature of each heated tank routed to the scrubber, and pressure of each tank routed to the scrubber.
- b. Scrubber/Carbon Box Operation
- i. Description of the process and control equipment in operation;
 - ii. Operating parameters of each scrubber and its related equipment at the time of the test, including but not limited to, pressure drop across the scrubber, free chlorine concentration in the scrubber system, pH of the scrubbing liquor, gas temperature, pump pressure, makeup water flow rate, amount of sodium hypochlorite (bleach) added, temperature of each heated tank routed to the scrubber, and pressure of each tank routed to the scrubber;
 - iii. Records showing that the scrubber pump and fan were operating during the testing and sampling;
 - iv. A list and description of all maintenance done on the scrubber/carbon box system and process from the date of receipt of this request until the dates of testing; and
 - v. Description of all raw materials in each tank during the test; including the amount and description of any and all additives added by MLC. Include copies of all vendor wastes manifests, MLC test results and MSDS for all materials present in each tank or processing vessel at the time of testing.
- c. Tank Operations
- i. Description of each tank and associated control equipment; including the information requested by item 9 below, by the testing and sampling protocol required by paragraph 6, and Appendix C of this request;
 - ii. The specific operating conditions of each tank or processing vessel at the time of the testing and sampling. Include, at a minimum:
 - 1. I.D. and a description of whether the tank or processing vessel was routed to the scrubber at the time of the testing and sampling;
 - 2. Liquid level of the tank and volume of material in each tank;

3. Material contents (including additives) of each tank at the time of the testing and sampling (provide MSDS, MLC testing results and incoming waste manifests) and specify the date each material was added to the tank or vessel;
4. Explanation of whether the tank was controlled by the scrubber/carbon box system;
5. Explanation of whether the tank was agitated during the testing and sampling period;
6. Specify the liquid level, temperature and pressure at the time of testing and sampling;
7. Identify the location within the tank where the temperature was measured;
8. Specify the operating parameters that were measured at each tank during sampling and testing (e.g., temperature, pressure); and
9. Specify the scrubber parameters that were measured during testing and sampling and that were required to be recorded by paragraph 3, above.
10. List and describe any maintenance that was done on the tanks from the date of receipt of this request until the date of sampling and testing.

d. Sampling and Analytical Procedures

- i. Sampling port location(s) and dimensions of cross-section;
- ii. Sampling point description, including labeling system;
- iii. Sampling depth(s);
- iv. Brief description of sampling procedures, including equipment and diagram;
- v. Description of sampling procedures (planned and accidental) that deviated from any standard method;
- vi. Description of sample storage, packing and shipping procedures;
- vii. Brief description of analytical procedures, including calibration;
- viii. Description of analytical procedures (planned or accidental) that deviated from any standard method; and
- ix. Quality control/ quality assurance procedures, tests and results.
- x. Results of the TO-15 test and how it was used to determine the individual HAPs to be tested by Method 18.

e. Appendix

- i. Complete results with example calculations using data obtained during the emissions test;

- ii. Raw field data (original, not computer printouts);
- iii. Laboratory report, with signed chain-of-custody forms;
- iv. Calibration procedures and results;
- v. Raw process and control equipment data, signed by plant representative;
- vi. Test log;
- vii. Project participants and titles; and
- viii. Related correspondence.

9. MLC must submit the following information regarding each tank or processing vessel at the facility to EPA within 30 days of receipt of this request:

- a. I.D and description of each tank or processing vessel;
- b. Type of each tank or each processing vessel (cone fixed roof, dome fixe roof, internal or external roof);
- c. An explanation as to whether each tank or processing vessel is controlled by the scrubber/carbon box system;
- d. Dimensions of each tank or processing vessel in feet;
- e. Dome roof radius and height of each tank or processing vessel, in feet;
- f. Slope of roof of each tank or processing vessel, in inches per feet;
- g. Slope of cone down bottom of tank, in inches per feet;
- h. Capacity of each tank or processing vessel at the facility in gallons;
- i. Shell paint color;
- j. Roof paint color;
- k. Annual throughput of each tank or processing vessel;
- l. An explanation as to whether the tank or processing vessel shell is insulated;
- m. An explanation as to whether the tank or processing vessel roof is insulated;
- n. Identify the different types of materials that are stored and/or processed in each tank or processing vessel (fuel, oil, asphalt, etc);
- o. Identify the different types of additives that are added to each tank or processing vessel by MLC during storage or processing;
- p. Provide the vendor waste manifests, MLC test results and MSDS of the different types of materials processed and/or stored and the different types of additives added into each tank or processing vessel at the facility, except you do not need to provide copies of the MSDS that were provided during the March 31 to April 1, 2015 inspection;
- q. Specify the typical maximum and minimum liquid level and maximum and minimum volume (in gallons) of material in each tank or processing vessel;

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- r. Provide pictures of the tanks or processing vessels from all sides and top;
 - s. Describe the heating mechanism of each tank or processing vessel;
 - t. Provide records of the temperatures and pressures measured at each tank or processing vessel for the period January 1, 2014 to the present and specify the location within the tank or processing vessel where the temperature and pressure were measured;
 - u. If temperature and pressure data from any tanks is not available explain why and then specify the ranges of temperature and pressure of each tank or processing vessel and the basis for specifying those ranges;
 - v. For each tank or processing vessel, if the tank material is circulated or agitated, explain by what means;
 - w. Date tank or processing vessel was installed;
 - x. Specify all tank or processing vessel additions, replacements or permanent shutdowns for the period January 1, 2012 to the present.
 - y. For each tank or processing vessel, specify the number of tank turnovers in a month and in a year and provide the dates of the most recent tank turnover. Provide supporting documentation such as operating records.
10. MLC must submit the following information to EPA within 60 days of receipt of this request. The records must be provided for the period January 1, 2012 through the present, unless otherwise designated. MLC does not need to provide copies of documents that were previously submitted to EPA during the March 31 to April 1, 2015 inspection:
- a. All oil processing and waste water shift reports;
 - b. All filter reports;
 - c. Total monthly incoming waste processed in the controlled production tanks, in gallons;
 - d. Daily scrubber logs;
 - e. Scrubber maintenance logs;
 - f. Results of analytical testing performed on incoming waste by MLC;
 - g. Results of analytical testing performed on outgoing product and wastewater by MLC;
 - h. Copies of records showing any response steps or corrective actions taken when the total static pressure drop across the scrubber was outside the normal range;
 - i. Copies of records showing any response steps or corrective actions taken when any scrubber parameter other than total static pressure drop across the scrubber was outside the normal range;
 - j. Copies of any maintenance work requests made;

- k. Records of all time periods when the scrubber/carbon box system was not operating. For each time period that the scrubber/carbon box was not operating, provide the reason the scrubber/carbon box was not operating (e.g., malfunction and description of the malfunction). Also, for each period that the scrubber/carbon box was not operating, provide records indicating the operating status of the heated tanks including their temperature and pressure;
- l. Description of all systems in place to measure, monitor, and record the following listed parameters and any others related to the scrubber system and/or tanks: pressure drop across the scrubber, free chlorine concentration in the scrubber system, pH of the scrubbing liquor, gas temperature, pump pressure, makeup water flow rate, amount of sodium hypochlorite (bleach) added, temperature of each heated tank routed to the scrubber, and pressure of each tank routed to the scrubber. Include in your response:
 - i. a description of each item of equipment (measuring device, monitoring device and recording equipment);
 - ii. the name, make and model of each item of equipment (measurement, monitoring and recording);
 - iii. the installation date of each item of equipment;
 - iv. the location of all probes and monitoring devices (include simple diagrams of the locations);
 - v. the range of measurement of the equipment;
 - vi. the calibration procedures you use;
 - vii. the frequency of monitoring and recording; and
 - viii. the manufacturer's recommended practices for calibration and maintenance.

Appendix C

Minimum Content of Testing and Sampling Protocol

General Information:

1. Provide the name and address of facility;
2. Provide the name, title, telephone number, e-mail address and facsimile number of contact person at facility;
3. Provide schematic drawing(s) of stack(s), temporary enclosures and sample ports;
4. Provide the location of plant;
5. Provide the name, contact person, telephone number, e-mail address and facsimile number for the testing company contracted to conduct the test; and
6. Provide process diagram(s) describing all pieces of equipment and bypasses. The diagram should include the flow of material through each process from raw material to finished product and should have all air pollution emission points identified by name.

Operating conditions:

1. List the process and operating rate and conditions of the process equipment and air pollution control equipment being tested;
2. List the range of process or operating rates for each emissions unit; and
3. Describe how the air pollution control and process equipment will be monitored. List all parameters that will be monitored, how they will be monitored, and the frequency at which they will be monitored.
4. Provide a description of and explanation of what normal operations are for Metalworking Lubricants in terms of process operations (e.g., what materials are processed and the quantity of what is processed) and scrubber/carbon box operation (e.g., what parameters the scrubber is operating at). Provide documentation and supporting evidence for what constitutes normal operations.
5. Provide a list and description of all maintenance work that will be performed on the scrubber/carbon box system, process and tanks from the date MLC receives this request until the day of testing and sampling.
6. With respect to the use of sodium hypochlorite in the scrubber system, provide documentation indicating: (1) the amount of sodium hypochlorite that is typically used and added to the scrubber system in daily practice; and (2) the conditions under which the sodium hypochlorite is added to the system, and how often it is added. In the protocol, MLC must specify the exact amount of sodium hypochlorite that will be used and added during testing and must produce documentation showing that the amount of sodium hypochlorite to be used and/or added in the scrubber system at the time of the testing is the typical amount used and/or added in daily practice.

Methods:

1. List of the test reference methods to be used to determine and demonstrate the accurate emission rate of each pollutant;
2. Specify the number of test runs, length of test run, and sampling rate for each method;
3. Provide a summary of reasons for proposing to use any alternative or equivalent method; and
4. Provide the list of organic HAPs that will be tested during the Method 18 test as determined through the TO-15 test.

Information on Tanks that are part of the Testing Pursuant to Paragraphs 2 and 3 of this Request:

1. Provide the I.D of each tank or processing vessel that will be routed to the scrubber during testing;
2. Identify the materials (including additives) that will be stored and/or processed in each tank or processing vessel during testing and specify the date that each material was added to the tank or vessel. Provide copies of all vendor waste manifests, MLC test results and MSDS for all materials present in each tank or processing vessel at the time of testing;
3. Identify and provide the MSDS for any materials or additives that will be added by MLC to the tanks or processing vessels during testing;
4. Specify the liquid level, temperature and pressure of the tank, and number of gallons in the tank at the time of testing; and
5. Specify what operating parameters will be measured at each tank or processing vessel to be tested.

Information on Tanks to be Sampled Pursuant to Paragraph 4 of this Request:

1. Provide the I.D of each tank or processing vessel to be sampled;
2. Identify the materials (including additives) that will be stored and/or processed in each tank or processing vessel during sampling and specify the date that each material was added to the tank or vessel. Provide copies of all vendor waste manifests, MLC test results, and MSDS for all materials present in each tank or processing vessel at the time of sampling;
3. Identify and provide the MSDS for any materials or additives that will be added by MLC to the tanks or processing vessels during sampling;
4. Specify what operating parameters will be measured at each tank or processing vessel to be sampled; and
5. Specify the liquid level, temperature and pressure of the tank, and number of gallons the tank at the time of sampling.

Appendix D

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

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7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
 8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING


I, Loretta Shaffer, certify that I sent a Request to Provide Information Pursuant to the
Clean Air Act by Certified Mail, Return Receipt Requested, to:

Metalworking Lubricants Co
1509 South Senate Avenue
Indianapolis, Indiana 46225

I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by First-Class Mail to:

Phil Perry, Chief
Air Compliance Branch
Indiana Department of Environmental
Management

On the 24th day of July 2015.


for Loretta Shaffer, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7644 3449